| - 1 | | | | |
|-----|---|---|--|--|
| 1 | Michael F. Ram, SBN 104805 | | | |
| 2 | mram@forthepeople.com Marie N. Appel, SBN 187483 | | | |
| 3 | mappel@forthepeople.com MORGAN & MORGAN | | | |
| 4 | COMPLEX LITIGATION GROUP | | | |
| 5 | 711 Van Ness Avenue, Suite 500 San Francisco, CA 94102 | | | |
| 6 | Telephone: (415) 358-6913 | | | |
| 7 | Facsimile: (415) 358-6923 | | | |
| | Jeffrey B. Cereghino, SBN 99480 jbc@cereghinolaw.com | | | |
| 8 | CEREGHINO LAW GROUP LLP | | | |
| 9 | 739 Bryant St San Francisco, CA 94107 | | | |
| 10 | Telephone: 415-433-4949 | | | |
| 11 | Charles J. LaDuca, Admitted Pro Hac Vice charles@cuneolaw.com | | | |
| 12 | Brendan Thompson, Admitted Pro Hac Vice | | | |
| 13 | brendant@cuneolaw.com CUNEO GILBERT & LaDUCA, LLP | | | |
| 14 | 4725 Wisconsin Avenue, NW, Suite 200 | | | |
| 15 | Washington, DC 200016 Telephone: (202) 789-3960 | | | |
| 16 | Attorneys for Plaintiffs and the Class | | | |
| 17 | UNITED STATES DISTRICT COURT | | | |
| 18 | FOR THE NORTHERN DISTRICT OF CALIFORNIA | | | |
| 19 | DANA GOLD, TAMMY EMERY, MARY | No. 3:14-cy-05373-RS | | |
| 20 | LOUISE FERENCE, LAURA NORRIS, | 110. 3.11 61 03373 103 | | |
| 21 | DONALD FURSMAN, and JOHN TRIANA, on behalf of themselves and all others similarly | CLASS COUNSEL'S REPORT RE | | |
| 22 | situated, | VOUCHER REDEMPTION STATUS THROUGH JULY 31, 2024; | | |
| 23 | Plaintiffs, | DECLARATION OF MICHAEL F. RAM | | |
| 24 | V. | | | |
| 25 | LUMBER LIQUIDATORS, INC., a Delaware corporation; and DOES 1 through | <u>CLASS ACTION</u> The Honorable Richard Seeborg | | |
| 26 | 200, inclusive, | The Honorable Richard Sectors | | |
| 27 | Defendants. | | | |
| 28 | | | | |

Class Counsel respectfully submit this report pursuant to the Order Granting Motion For Final Approval of Settlement Agreement (ECF 331) which requires Class Counsel to provide the Court with a report every six months regarding the status of voucher redemption including the percentage rate at which vouchers are redeemed, the total dollar value of redeemed vouchers, the amounts are ascribable to labor and to products.

Plaintiffs' Counsel have received the following information from Lumber Liquidators' counsel which reflects the voucher redemption status through July 31, 2024. Exhibit A to Declaration of Michael F. Ram.

Voucher Redemption Status

August 23, 2021 through July 31, 2024

| Redemption Description | Amount | | Percentage |
|--|--------|--------------|------------|
| a. Merchandise Shipped | \$ | 4,989,802.37 | 97.34% |
| b. Installation | \$ | 16,391.53 | 0.32% |
| c. Sales Tax | \$ | 120,038.55 | 2.34% |
| Total Voucher (Total of a through c) | \$ | 5,126,232.45 | 100.00% |
| d. Voucher Redeemed (shipment pending) | \$ | 288,834.74 | |
| Total Vouchers Redeemed (Amount = Total of a through d; Percentage out of \$16M) | \$ | 5,415,067.19 | 34% |

Dated: August 23, 2024

MORGAN AND MORGAN COMPLEX LITIGATION GROUP

By: /s/ Michael F. Ram

CLASS COUNSEL'S REPORT RE VOUCHER REDEMPTION STATUS THROUGH JULY 31, 2024

NO. 3:14-cv-05373-RS

| - 1 | |
|---------------------------------|--|
| 1 | Michael F. Ram (SBN 104805) |
| 2 | mram@forthepeople.com Marie N. Appel (SBN 187483) |
| 3 | mappel@forthepeople.com MORGAN AND MORGAN |
| 4 | COMPLEX LITIGATION GROUP 711 Van Ness Ave, Suite 500 |
| 5 | San Francisco, CA 94102 |
| 6 | Telephone: 415-358-6913 |
| 7 | Jeffrey B. Cereghino (SBN 99480) jbc@cereghinolawgroup |
| 8 | CEREGHINO LAW GROUP 739 Bryant St |
| 9 | San Francisco, CA 94107 Telephone: 415-433-4949 |
| 10 | |
| 11 | Charles J. LaDuca (Pro Hac Vice) charles@cuneolaw.com |
| 12 | Brendan Thompson (Pro Hac Vice) brendant@cuneolaw.com |
| 13 | CUNEO GILBERT & LADUCA LLP 4725 Wisconsin Avenue, NW, Suite 200 |
| 14 | Washington, DC 20016 |
| 15 | Telephone: 202.789.3960 Attorneys for Plaintiffs and the Class |
| 16 | Automeys for Frankins and the Class |
| 17 | |
| 18 | |
| 19 | |
| 20 | |
| 21 | |
| 22 | |
| 23 | |
| 24 | |
| 25 | |
| 2627 | |
| 21 | |

I, Michael F. Ram, declare as follows: 1 2 I am an attorney with Morgan & Morgan, Complex Litigation Group, counsel of 1. 3 record for Plaintiffs Dana Gold, Tammy Emery, Mary Louise Ference, Laura Norris, Donald 4 Fursman, and John Triana, on behalf of themselves and all others similarly situated in this case. I 5 have personal knowledge of the facts stated here, except as to those matters stated on information 6 and belief, and I believe such matters to be true. If called as a witness, I would testify as to the 7 matters stated here. 8 2. Attached as Exhibit A is a true and correct copy of the Excel spreadsheet my office 9 received from Lumber Liquidators' counsel on August 20, 2024. 10 I declare under penalty of perjury under the laws of the United States of America that the 11 foregoing is true and correct. Executed at San Francisco, California, this 23rd day of August, 2024. 12 13 /s/ Michael F. Ram Michael F. Ram 14 15 16 17 18 19 20 21 22 23 24 25 26 27 28